

## **EXHIBIT 130**

### **Excerpts from Deposition Transcript of Andrew Parrish**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
CIVIL ACTION NO. 1:14-CV-00954-LCB-JLW

STUDENTS FOR FAIR  
ADMISSIONS, INC.,

Plaintiffs,

vs.

UNIVERSITY OF NORTH  
CAROLINA, et al.,

Defendants.

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SECOND AMENDED DEPOSITION  
OF  
ANDREW PARRISH

THIS DEPOSITION CONTAINS HIGHLY CONFIDENTIAL AND  
PROPRIETARY INFORMATION AND IS SUBJECT TO A PROTECTIVE  
ORDER RESTRICTING PUBLIC DISCLOSURE OF ITS CONTENTS

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TAKEN AT THE OFFICES OF:  
UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL  
222 East Cameron Avenue  
110 Bynum Hall  
Chapel Hill, NC 27514

06-21-17  
9:02 A.M.

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1 decent bit when I wasn't reading applications or  
2 doing other recruitment activities.

3 Q. So you - just so I'm clear, your -- your  
4 two tasks in the office are reading applications  
5 and recruitment activities?

6 A. Correct.

7 Q. You have no other roles within the  
8 office?

9 A. I would say recruitment activities is a  
10 broad category but, I would say those are the two  
11 major categories.

12 Q. How does the admissions use race in  
13 evaluating applicants?

14 A. I would say it's one factor amongst a  
15 lot of other factors that we use.

16 Q. When you're reading applications, how do  
17 you look at an applicant's race?

18 A. So, I see it on the evaluation summary  
19 screen in Connect Carolina and I see a lot of  
20 other factors as well. I see whether in-state,  
21 out of state, if they're fee waiver or not, if  
22 they're a first generation college student, if --  
23 what major they are and which deadline, so I see  
24 that immediately. And then, there are a lot fo  
25 other factors in the application that we, then,



1           A.    The way "plus" is written here, I don't  
2    know how to answer that ---

3           Q.    Okay.

4           A.    --- because that's not how we think  
5    about it or how I think about it.

6           Q.    That's not how you think about it?

7           A.    Yeah.

8           Q.    Do you know if anybody else thinks about  
9    it as a plus?

10                   MR. TULCHIN: Object to form.

11           A.    I'm not sure.

12           Q.    (Mr. Weir) Okay. So if that's not how  
13    you think about it, how do you think about race or  
14    ethnicity?

15           A.    It's a factor that I see on the  
16    evaluation summary screen when I'm looking at all  
17    the other factors on the evaluation summary screen  
18    and it's taken into as one factor amongst all the  
19    others when I start looking at rest of the  
20    materials that are provided with the application.

21           Q.    So give me an example if -- of how you  
22    would use it as a factor.

23           A.    What do you mean by as a ---

24           Q.    So, if you're reviewing an application,  
25    let's say, of a -- a Hispanic student, how would

1 -- how would that factor into your decision making  
2 as to when to recommend that applicant be  
3 admitted?

4 A. It would be, basically, a factor that I  
5 would see along with a lot of the other factors in  
6 the application and as I'm reading through the  
7 application, I'm balancing a lot of different  
8 factors and they kind of form this composite  
9 picture of the whole of the individual and then I  
10 make my decision.

11 Q. So, is it fair to say that a student's  
12 race or ethnicity can be a factor that favors  
13 admission of a particular student?

14 A. I would say it could be a factor amongst  
15 a lot of other factors that could favor -- there  
16 are a lot of different things that we use to favor  
17 an applicant or make a -- to advocate for a  
18 student.

19 Q. Sure. So, it -- it -- the race or  
20 ethnicity can factor in favor of a student's  
21 admission?

22 MR. TULCHIN: Objection.

23 A. I would say race or ethnicity, yes, can  
24 be a factor in favor of but it can also -- there  
25 are a lot of other factors that could also be used



1           A.    --- and the ethnicity certainly isn't  
2           the only one.

3           Q.    Sure.  So, for first generation college  
4           students, do they -- they tend to test lower than  
5           those who have parents that went to college?

6           A.    I believe so.  Yes.

7           Q.    Is it fair to say that the -- the UNC's  
8           admissions office treats URMs with lower test  
9           scores differently than non-URMs with the same  
10          testing levels?

11                   MR. TULCHIN:  Objection.

12          A.    Will you repeat the question?

13          Q.    (Mr. Weir)  Sure.  Is it fair to say  
14          that UNC treats URMs with low test -- lower test  
15          scores differently than non-URMs at the same  
16          testing levels?

17                   MR. TULCHIN:  Objection.

18          A.    No.  Because I wouldn't say ethnicity's  
19          the only thing we're looking at to interpret their  
20          scores.

21          Q.    (Mr. Weir)  Okay.  What other factors  
22          have you taken into account -- take in to account  
23          when you're evaluating test scores?

24          A.    I would say the first generation college  
25          student, fee waiver students...

1 Q. Sure. Does UNC have lower -- lower  
2 testing criteria for admitting URM students?

3 A. Well, we don't have a criteria in mind.  
4 So, I would say no because we don't any type of  
5 preset criteria that guides us.

6 Q. Okay. Getting back to the demographic  
7 backgrounds, is it your position that a person's  
8 race can cause them to have lower test scores?

9 A. I don't know.

10 Q. But you said you do take into account  
11 the fact that URMs have lower test scores,  
12 nationally, when you evaluate the applications.

13 A. Yes, I take that into account because  
14 that was something that was shown to me; that the  
15 national averages for underrepresented minorities  
16 tend to be lower than that of Asian and white  
17 counterparts.

18 Q. So you take that into account because  
19 somebody in the admissions office -- Okay.  
20 Scratch that.

21 (Off-record comments)

22 (EXHIBIT NUMBER 23 WAS MARKED)

23 Q. I doubt you've seen this document before  
24 but, please take a moment to review it. It is an  
25 excerpt from UNC's answer in this case.



1 Q. So, is it easier for an African American  
2 to get in to UNC than it is for an Asian American  
3 student?

4 MR. TULCHIN: Objection.

5 A. No. I wouldn't say that.

6 Q. (Mr. Weir) Why wouldn't you say that?

7 A. Because we still look at all the  
8 different factors involved and an applicant for an  
9 African American the same as we would for an Asian  
10 American.

11 Q. So, for African American students, is --  
12 does UNC de-emphasize test scores?

13 MR. TULCHIN: Objection.

14 A. No. I wouldn't say de-emphasize test  
15 scores. We'd take the test scores for what they  
16 are in combination with all the other factors that  
17 are in the application.

18 Q. (Mr. Weir) All things being equal, will  
19 a higher test score make it more likely or less  
20 likely that a student will be admitted to UNC?

21 MR. TULCHIN: Objection.

22 A. What do you mean by, "all things being  
23 equal"?

24 Q. (Mr. Weir) Exactly what I said, all  
25 things being equal for an applicant.